



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007*

February 28, 2019

BY ECF

The Honorable Ronnie Abrams
United States District Judge
Southern District of New York
40 Foley Square
New York, New York 10007

Re: *United States v. Joseph Manuel Hunter, S10 13 Cr. 521 (RA)*

Dear Judge Abrams:

The Government respectfully submits this letter in connection with the sentencing of defendant Joseph Hunter scheduled for March 7, 2019, at 11:00 a.m.

Hunter is a former soldier who used the skills and experience he gained in the U.S. military to become a merciless mercenary killer. For years, Hunter tortured, kidnapped, and killed people for money. During less than 10 months between 2011 and 2012, Hunter recruited and led the so-called “kill teams” that murdered Catherine Lee and Noemi Edillor in the Philippines, and tried to kill Dazl Silverio, Fitch Penalosa, and Manuel Jalos. Motivated by greed alone, he has shown no remorse for his role in these murders, attempted murders, and other acts of violence all over the world. Based on that conduct, a sentence of life imprisonment is both mandatory and entirely appropriate.

Background

I. Offense Conduct

Hunter and co-defendants Adam Samia and Carl David Stillwell worked as mercenaries and killers during a course of conduct that involved numerous acts of violence undertaken at the direction of cooperating witness Paul Calder LeRoux, which culminated in efforts in the Philippines during January and February 2012 to kill at least four people, including the February 12, 2012 murder of Catherine Lee. (PSR ¶ 16).

LeRoux’s Mercenary Team: 2008-2010

In approximately 2008, LeRoux hired a team of mercenaries, including Hunter and Samia, to engage in acts of violence, including kidnapping and murder, across the world. All of these men understood that LeRoux might require them to undertake violence, including murder, to protect or recover LeRoux’s assets. The mercenary team operated under the name of a front

company, Echelon Associates. Hunter and Samia were recruited for this job because of their military background and, in the case of Samia, his tactical weapons training. Initially, Hunter's and Samia's work for LeRoux focused on providing so-called "security" for individuals seeking to purchase gold in Africa on behalf of LeRoux in connection with an asset-based money laundering scheme. (PSR ¶ 18).

Hunter engaged in acts of violence for LeRoux as part of the Echelon mercenary team. In connection with gold-related disputes in approximately 2008 and 2009, Hunter shot co-conspirator Steve Hope Hahn in the hand, and participated in attempted murders that included the firebombing of a co-conspirator's home and throwing a grenade inside another co-conspirator's residence. Hunter also engaged in weapons-trafficking activities in multiple countries on behalf of LeRoux, including by helping to corruptly obtain end-user certificates for military-grade weapons and firearms that were transported to the Philippines on a vessel named the "Ufuk," which was interdicted in the Philippines in 2009. Hunter also looked into organizing a coup d'état against the government of the Seychelles. As depicted on a video of Hunter surreptitiously recorded in Thailand (the "Thailand Video"), Hunter described these activities—as well as the murders of Lee and Edillor—as being "just like you're in war" and akin to "James Bond movies." (PSR ¶ 20).

Samia established a close relationship with Hunter between approximately 2008 and 2010. Hunter and Samia worked together in the Democratic Republic of the Congo and Mali in 2008. In July 2008, Hunter asked another mercenary, Dave Smith, to assign Samia or one of two other mercenaries as "another security guy" for "trips into the jungle 4 days out of the week with two overnight stays" for the purpose of buying gold with Hope Hahn. In October 2008, Hunter used his U.S. military email account to send Samia a message referencing his shooting of Hope Hahn: "I did the thing with bad Steve and then came to Mozambique." In May 2009, Hunter informed Samia that he was "still doin the same thing" and "suppose[d] to head out to Africa again next week." (PSR ¶ 21).

In 2009 and 2010, Hunter, Samia, and Smith corresponded with each other—while Hunter and Samia were in the United States—regarding committing murders for hire abroad. In December 2009, Hunter emailed Samia, "I just got here in the US for the holidays and I will give you a call. This is something else other than what I told you about. It is for doing the serious thing in Africa." The "serious thing" was a reference to murders for hire. Samia replied, "Roger that bro give me a call." Several days later, Smith emailed Samia, "The job is simply it 9k a month plus 25k bonus on each job done as u know what joe [Hunter] does for us clean up with our problem people. You will work with joe. Need answer." The "25k bonus on each job done" was a reference to murder for hire, for which LeRoux paid \$25,000 per murder. (PSR ¶ 22).

Early 2011: LeRoux Promotes Hunter to Manage the Kill Teams

LeRoux murdered Smith in December 2010, and so in early 2011, promoted Hunter to take Smith's place as the head of the mercenary teams. Hunter later explained on the Thailand Video that LeRoux had "promoted" him to take Smith's position after Smith "got killed for stealing money." Hunter recruited Chris DeMeer, a former LeRoux mercenary, and cooperating witness Timothy Vamvakias in early 2011. Hunter told DeMeer and Vamvakias that LeRoux had a "list" of people to kill, and that Hunter would be the new manager of the kill teams. Hunter assigned DeMeer to the "ninja side of the house," meaning that DeMeer and his partner would be

committing murders for hire, and assigned Vamvakias to the “business side of the house,” meaning smuggling illegal prescription drugs from Mexico to Texas. (PSR ¶¶ 24-25).

Between 2011 and 2012, Hunter managed the deployment of mercenary teams on LeRoux’s behalf, including to perform murders-for-hire. In February and March 2011, while Hunter was recruiting new members of the kill team and mercenary team, he traveled home to the United States. Hunter returned to the Philippines in March 2011. One of the people that Hunter had killed at LeRoux’s direction was Edillor. The murder was executed in June 2011 by Chris DeMeer and another man known as “Daddy Mac.” After Edillor’s murder, Hunter sent a news article about it to LeRoux, and wrote: “There is your fucking proof. Have my guys money tomorrow!!!!” LeRoux then paid Hunter, DeMeer, and Daddy Mac for the murder. (PSR ¶ 26).

Meanwhile, in the spring of 2011, Samia recruited Stillwell to join the mercenary team, and wrote Hunter in April 2011 that Samia had a good “second guy,” meaning Stillwell. Hunter replied that while he did not need Samia and Stillwell at that time, he might need them in the future. (PSR ¶ 28). That time came in August 2011, when Hunter informed LeRoux via email that both DeMeer and Mac Daddy were “quitting.” (PSR ¶ 26).

Fall 2011: Hunter Tasks Samia and Stillwell with Murders

After DeMeer and Daddy Mac quit the kill team, LeRoux directed Hunter to recruit a new, two-man kill team. LeRoux told Hunter that he wanted to sit down with the new kill team to discuss the manner in which they should commit the murders. During this same time, Hunter expressed concern to Vamvakias that Hunter would lose his job if he did not find a new kill team. (PSR ¶ 29).

In September 2011, Hunter recruited Samia and Stillwell to be the new kill team. On September 30, 2011, Hunter emailed LeRoux to confirm that Samia would travel to Brazil to meet with LeRoux. Hunter told LeRoux that Samia had agreed to be a member of the new kill team, and would travel to Brazil to meet with LeRoux to discuss the upcoming murders. In early October 2011, Hunter also told Vamvakias that Samia had been assigned a “bonus job,” meaning murder, with a partner. (PSR ¶ 30).

During the same time, in September and October 2011, Hunter worked with Samia to recruit two U.S.-based drivers—Mitchell Christiansen and John Wilson—to transport for LeRoux a stash of illegal tramadol from a safe house in El Paso, Texas to the east coast. (PSR ¶ 32).

With respect to the murder-for-hire work, Samia first tried to travel to Brazil in October 2011 to meet with LeRoux. But the trip was canceled when Samia failed to obtain a necessary visa. In mid-October, Hunter instructed Samia by email:

Your job and one of your other guys [*i.e.*, Stillwell] is here in [Philippines] following my orders. No negotiations, no complaining, no bullshit!!! You will be paid to do a job with a result. The key word is a result. We do no[t] pay for thinking about it, we do not pay for trying, we do not pay for your time, we pay for the end result!!!

Days later, Hunter informed Samia that he was “on standby until the other guy [*i.e.*, Stillwell] is ready and you guys will come here together for Ninja stuff,” meaning murders for hire. (PSR ¶¶ 33-34).

Between October and December 2011, Hunter called Vamvakias from a Kentucky phone number. Hunter told Vamvakias that he was in Kentucky and that he intended to meet with Samia and his partner to discuss the bonus job. Vamvakias testified that he did not know whether that meeting happened. (PSR ¶ 37).

Stillwell and Samia purchased their tickets to the Philippines on December 5 and 6, 2011, respectively. They purchased tickets to travel on different days, on different flights, in order to avoid detection. LeRoux sent Samia money via Western Union to reimburse the cost of Stillwell’s plane ticket. (PSR ¶ 38).

On January 2, 2012, Samia received an email from Hunter directing Samia where to go after he arrived at the Manila International Airport, and on January 3, Samia emailed those instructions to Stillwell. Samia and Stillwell traveled to the Philippines on January 8 and 10 2012, respectively. (PSR ¶ 39).

January-February 2012: Hunter, Samia, and Stillwell’s Efforts to Murder Four People

Samia and Stillwell arrived in the Philippines on January 10 and 11, 2012, respectively, and participated in efforts to murder four people during the trip: Catherine Lee, Dazl Silverio, Fitch Penalosa, and Manuel Jalos. Law enforcement found documents relating to the defendants’ targeting of each of these individuals on electronic devices seized from Samia’s and Stillwell’s homes. (PSR ¶ 40).

The first target LeRoux provided to Hunter, Samia, and Stillwell was Dazl Silverio. Just days after Samia and Stillwell arrived in the Philippines, Hunter wrote to LeRoux, “Need another person. The one you gave me is going to take along [*sic*] time. She has four addresses, one of which is an island 200 miles from here. . . . Need someone we can find now, and get it done right away.” LeRoux then provided a second target: Catherine Lee. Lee was a real estate agent in the Philippines whom LeRoux believed had stolen money from him. (PSR ¶ 41).

On January 17, 2012, Hunter asked LeRoux for a “picture of this subject,” meaning Lee. On February 6, 2012, Hunter again asked LeRoux for a murder target:

We are checking on the firsts [*sic*] subject you gave but they have not been seen and one of the addresses is empty now and for sale. We need a new subject with a photo, address and car plates. If the guys don’t have a good photo, everything is put at risk because they have to inquire and find out about the subject and that makes people suspicious. All of these areas are gated, and as soon as the guys park to pull surveillance, within a few minutes the roving patrol comes by and asked them what they are doing. These guys already draw attention, and them sitting somewhere draws even more.

LeRoux later provided Hunter, Samia, and Stillwell with target packages for Penalosa and Jalos. In the meantime, Samia and Stillwell conducted surveillance to prepare to murder Lee, who worked in the area of Las Piñas in the Philippines. A digital camera seized from the Samia's residence on the day of his arrest contained surveillance photographs of a business where Lee worked, which were taken in late-January 2012. (PSR ¶¶ 42-43).

On January 23, 2012, Samia sent an email to Hunter requesting "OP funds" to facilitate preparations for the murder. In a separate email, Hunter requested weapons from LeRoux, including a "Rifle Silenced with optics" and a ".22 or 380 Pistol" with a silencer. Hunter later confirmed that he had received the weapons, requested a "bigger caliber rifle to go along with the small caliber one I received today," and indicated that "Sal" and "JT"—Samia and Stillwell, respectively—would be owed \$35,000 if they completed the murder ("Mission Success"). (PSR ¶ 44).

On February 4, 2012, Hunter emailed LeRoux to request funds to purchase and modify a computer bag in order to conceal a weapon, and to pay for travel to "this las pinas place" where Lee was located. At the same time, Samia and Stillwell used the cover of potential real estate purchasers in order to establish contact with Lee. (PSR ¶ 45).

On February 12, 2012, Lee met with Samia and Stillwell to show them several real estate properties. Later that day, as Stillwell drove the Toyota Innova van, Samia shot Lee twice in the face using a .22 caliber pistol with a silencer, and he and Stillwell dumped her body on a pile of garbage. Lee's body was found the following morning, February 13. An autopsy examination subsequently determined that Lee died as a result of the gunshot wounds to her face; one gunshot wound under each eye. (PSR ¶ 46).

A cellphone seized from Stillwell on the day of his arrest contained photographs bearing a "Date Modified" of February 12, 2012—*i.e.*, the day that Lee was murdered—that appear to depict, among other things, the Toyota Innova van in which Lee was murdered, and Lee's head covered in blood. (PSR ¶ 47).

The following day, Hunter informed LeRoux that Samia and Stillwell "plan on doing one more"—meaning one more murder—before they returned home to the United States and then returned to the Philippines to commit even more murders. Shortly after Lee's murder, Samia sent Hunter an "expense report," and LeRoux gave Hunter \$35,000 each for Samia and Stillwell as payment for Lee's murder, which Hunter gave to Samia and Stillwell. (PSR ¶¶ 48-49).

Forensic evidence from laptops seized from Samia and Stillwell showed that they continued to research their final murder target in late February 2012. On February 27, 2012, Hunter reported to LeRoux that Samia and Stillwell had been to the last murder target's "house for a couple of days and are going to his office today." Two days later, however, Hunter informed LeRoux that Samia and Stillwell were "going home for tax filing" and had indicated that they were "definitely coming back." Stillwell returned to North Carolina on or about February 29, 2012, and Samia traveled home on or about March 8, 2012. (PSR ¶ 50).

On March 18, 2012, Hunter sent Samia an email in which he criticized the manner in which Samia and Stillwell ("JT") had conducted the murder:

Let me explain, you signed up for a job with JT, in which I am responsible for both of you. I am expected to get these things done. You said you wanted the job. First, I waited a year for you to be available because of your other plans. Then you finally come onboard, do one sloppy job which could have endangered everyone and left. . . .

Indeed, Hunter persisted in his belief of Samia and Stillwell's mishandling of Lee's murder. To that end, during the March 2013 meeting with the prospective new recruits, Hunter described Samia and Stillwell's murder of Lee in negative terms:

Now . . . I . . . had . . . two other guys that wanted bonus work. They did the job, but they did it sloppy and I fired them. I sent them back home 'cause these guys . . . the same thing. Another real estate agent and, um, when they was planning initially, they did the same thing. They called her, said, "I wanna see houses," and they told—they came back. They said, "Yeah, she's gonna meet, meet us and, uh, take us to show some houses."

I said, "O.K. guy, this is I how you do it." I said, "Have her meet you at McDonald's." They call it Jolly, like a Jo, Jollibee. It's like McDonald's, right? I said, "Have her meet you in the parking lot at Jollibee. Get her into your car and take off so nobody saw you guys together. Maybe a couple of people in the restaurant that they won't remember. Right?" I said, "As soon as she gets in the car, drive down the road." I said, "Drive down the road maybe a quarter mile, a half kilometer. Turn around and shoot her. It's done. Nobody saw anything." They have a silencer, so [*unintelligible*], right? "Just kill her in the car." I said, "Take a blanket with you and wrap her up." And then, just keep driving and find a place to dump her.

They saw the real estate agent. So they went . . . They did this for like three different days. . . . They were Americans so I got them back to America . . .

(PSR ¶¶ 51-52).

II. The Charges and Trial

Superseding Indictment S10 13 Cr. 521 (RA) charged the defendants with (i) participating in a conspiracy, from in or about 2008, up to and including in or about July 2014, to commit murder-for-hire, in violation of 18 U.S.C. § 1958(a); (ii) from at least in or about 2011, up to and including in or about July 2014, committing murder-for-hire, in violation of 18 U.S.C. §§ 1958(a) and 2; (iii) participating in a conspiracy, from in or about 2008, up to and including in or about July 2014, to murder and kidnap in a foreign country, in violation of 18 U.S.C. §§ 956(a)(1) and 956(a)(2)(A); (iv) from at least in or about January 2012, up to and including in or about March 2012, using and carrying a firearm during and in relation to a crime of violence constituting murder, in violation of 18 U.S.C. §§ 924(j) and 2; and (v) as to Samia and Stillwell only, participating in a conspiracy to commit money laundering, from in or about 2008, up to and including July 2014, in violation of 18 U.S.C. §§ 1956(h) and 3238.

Trial commenced on April 2, 2018. The jury convicted the defendants on all counts on April 18, 2018.

Discussion

Hunter was the leader of the kill team that murdered Catherine Lee, and personally recruited her murderers. The mandated sentence of life imprisonment is the only appropriate sentence in this case. It is the only sentence that will provide sufficient punishment for Hunter's crimes, reflect the seriousness of those crimes, and provide adequate justice for Catherine Lee and her husband, child, and friends.

The defendant joined LeRoux's organization in 2008 and almost immediately thereafter began committing and planning horrific, violent crimes such as torture, kidnapping, and murder. *See Hunter*, 2018 WL 4961453, at *4 (“[I]t would have been eminently reasonable for the jury to conclude that while Hunter was in the United States during December of 2009, he was conspiring with both Samia and Smith to commit murders-for-hire abroad at the direction of LeRoux and in particular was attempting to recruit Samia.”). Hunter became the leader of LeRoux's kill team in 2011, when Hunter “became the sole person responsible for managing the murderers-for-hire, which included hiring, overseeing, and otherwise acting as an intermediary between them and LeRoux.” *Id.* at *2. Hunter recruited, directed, and supervised the kill team that murdered Noemi Edillor in 2012. (PSR ¶ 26). Hunter recruited Samia and Stillwell to travel to the Philippines to murder as many people as possible for money. *See Hunter*, 2018 WL 4961453, at *7 (“Samia and Stillwell had grander ambitions, aspiring, according to Hunter, to kill one person per month for LeRoux.”). Those four people—Catherine Lee, Dazl Silverio, Fitch Penalosa, and Manuel Jalos—represented nothing but money to Hunter. Hunter passed target packages to Samia and Stillwell. Under Hunter's supervision and leadership, Samia and Stillwell sat outside their victims' homes and businesses waiting, watching, and taking pictures. *See id.* (“In accordance with those plans, LeRoux gave [Hunter, Samia, and Stillwell] third and fourth targets: Fitch Penalosa and Manuel Jalos Although they killed neither of these people, Samia and Stillwell undertook efforts to surveil them, both before and after killing Lee.”).

On February 12, 2012, after Samia and Stillwell had lured Catherine Lee into their van, Samia shot Lee twice in the face, killing her. Samia and Stillwell then took photographs of her bloody head as proof that they had killed her, so that LeRoux would pay them. After murdering Lee and taking pictures of her lifeless body, Samia and Stillwell dumped her in the trash, face-down, in the rain. To Hunter, Samia, and Stillwell, taking a life meant next to nothing. The defendants continued to try to kill another victim after Lee's murder, but ultimately Samia and Stillwell left the Philippines in February and March 2012. To Hunter, however, it was business as usual: In April 2012, he attempted to recruit “1 Ninja for the game,” that is, another mercenary killer. *See GX-406-18*. Hunter later glorified his involvement in these heinous activities as being “just like you're in war” and akin to “James Bond movies.” (PSR ¶ 20).

The Court's imposition of sentences on Hunter and his co-defendants is an important step in the vindication of the rights of Catherine Lee and her family. A sentence of life imprisonment, which is the mandatory sentence required by statute, is the only fair and just sentence in this case.

Conclusion

Given the grave nature of this crime and the suffering caused to Catherine Lee's family as a result of her murder, the Court should impose the mandatory sentence of life imprisonment.¹

Respectfully submitted,

GEOFFREY S. BERMAN
United States Attorney

By: _____/s/
Emil J. Bove III
Rebekah Donaleski
Assistant United States Attorneys
(212) 637-2444/2423

Cc: Defense Counsel (by ECF and email)

¹ The Government will separately submit a brief regarding forfeiture in advance of sentencing.